

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

JUAN JOHNSON,)
)
 Plaintiff,) 05 C 1042
)
 v.) Judge Grady
)
 REYNALDO GUEVARA, and the)
 CITY OF CHICAGO,)
)
 Defendants.)

**PLAINTIFF'S MOTION IN LIMINE NO. 15
TO BAR REFERENCES TO THE FACT THAT MR. JOHNSON ASSUMED THE
RANK OF "SECURITY" WHILE IN STATESVILLE PRISON IN THE 1990s**

NOW COMES Plaintiff, JUAN JOHNSON, by his counsel, and respectfully brings the following motion *in limine*.

Discussion

In response to questions at his deposition, Mr. Johnson candidly acknowledged that he assumed the role of gang "security officer" in the penitentiary. This fact is extremely prejudicial, but not relevant, and certainly not relevant enough to outweigh the risk of unfair prejudice. References should be barred.

WHEREFORE, Defendants should be barred from referencing the fact that Mr. Johnson was a "security officer" for the gang while in the penitentiary in the 1990s.

RESPECTFULLY SUBMITTED,



Attorneys for Plaintiff

Arthur Loevy
Jon Loevy
Russell Ainsworth
LOEJVY & LOEJVY
312 North May Street, Suite 100
Chicago, IL 60607
(312) 243-5900

Thomas G. Gardiner
GARDINER KOCH & WEISBERG
53 West Jackson Blvd., Suite 950
Chicago, Illinois 60604
(312) 362-0000

Daniel J. Stohr
222 North LaSalle Street
Chicago, Illinois 60601